



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

March 20, 2025

**BY ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

*Re: The New York Times Company v. United States Department of State,  
No. 24 Civ. 8747 (JLR)*

Dear Judge Rochon:

This Office represents Defendant United States Department of State in the above-referenced case brought by Plaintiffs The New York Times Company and Amy Julia Harris, pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I write on behalf of all parties pursuant to the Court’s order that the parties submit joint status reports every 45 days. *See* Dkt No. 13. Defendant reports that its searches for responsive records are complete and that it is preparing records for processing.

On February 21, 2025, Plaintiffs, through counsel, sent Defendant a proposal to prioritize production of a narrower set of records and to defer processing of other records. Specifically, Plaintiffs have proposed that Defendant prioritize processing the records responsive to Requests 11 and 12 in the Complaint (Dkt No. 1 ¶¶ 96-106) and a portion of the records responsive to Requests 2 and 3 (*id.* ¶¶ 48-58). Plaintiffs have conveyed that they believe these records are likely to be stored as spreadsheets or in databases and that prioritizing them would not require processing a substantial number of discrete documents. Defendant has not yet determined whether that is the case, and whether it will be feasible to proceed in the manner Plaintiffs propose. However, Defendant will update Plaintiffs on the status of the records by March 27, 2025. Depending on the substance of that update, Plaintiffs may request a hearing with the Court regarding a production schedule.

The parties will submit their next status report in 45 days—by May 5, 2025.

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Respectfully submitted,

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cc: All counsel of record (via ECF)